

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

**MOTION OF CHAMBER OF PROGRESS AND NETCHOICE, LLC FOR LEAVE TO
FILE BRIEF AS *AMICI CURIAE* IN OPPOSITION TO PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 7 and LR 7.01, Chamber of Progress and NetChoice, LLC (“*amici*”) respectfully move the Court for leave to file the attached brief (Exhibit A) as *amici curiae* in opposition to Plaintiffs’ Motion for Preliminary Injunction (ECF No. 40). *Amici* represent a broad set of stakeholders and offer distinct and useful perspectives on litigation involving technology, including through the regular filing of amicus briefs and public comments. As their proposed brief explains, (1) generative artificial intelligence (“AI”) tools are already providing substantial public benefit and hold immense promise to further benefit the public; (2) the preliminary relief requested by Plaintiffs poses a substantial threat to the public interest in development and availability of generative AI technology; and (3) the novel and complex factual and legal issues raised in Plaintiffs’ motion are ill-suited for preliminary determination on a limited record, especially in light of the numerous other cases raising similar issues that are proceeding through fact and expert discovery that will elucidate the issues in this developing area.

For these reasons, and as set forth in the accompanying Memorandum of Law, *amici* should be granted leave to file the proposed *amicus* brief: the proposed brief will assist the

Court in understanding the substantial public interest in generative artificial intelligence, as well as the potential far-reaching impact of a decision on the merits of the claims asserted in Plaintiffs' Motion.

Counsel for *amici* conferred with counsel for the parties regarding the relief requested by this motion. Defendant consents to the filing of the proposed *amicus* brief. Plaintiffs oppose the requested relief because they do not believe that amicus briefs are necessary at this stage.

Accordingly, *amici* respectfully request that the Court grant leave to file the attached *amicus* brief.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kevin C. Klein".

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CERTIFICATE OF SERVICE

I certify that I filed the foregoing Motion for Leave to File Amicus Brief on the Court's CM/ECF system on this 19th day of January, 2024, which forwarded a copy to:

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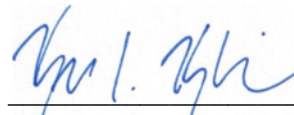
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